

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JOSEPH BOND, on behalf of himself and others similarly situated,	:	
	:	CIVIL ACTION FILE NO.
	:	3:24-CV-02551-L
Plaintiff,	:	
	:	
v.	:	
	:	JURY TRIAL DEMANDED
FOLSOM INSURANCE AGENCY LLC,	:	
CODY FOLSOM	:	
	:	
Defendants.	:	

JOINT MOTION TO EXTEND CASE SCHEDULE

Plaintiff Joseph Bond (“Bond”) and Defendants Folsom Insurance Agency LLC and Cody Folsom (“Folsom”) jointly move the Court to extend the current case schedule by ninety (90) days, and in support thereof respectfully show the following:

1. Plaintiff initiated this putative class action alleging that he received pre-recorded messages that violated the Telephone Consumer Protection Act (“TCPA”) from Folsom.
2. On March 19, 2025, the Court entered an Initial Scheduling Order [Doc. 39] establishing case deadlines.
3. To date, the Parties have engaged in written discovery, third party discovery, and Defendants have taken Plaintiff’s deposition.
4. After motion practice, the Defendant produced information in discovery identifying a vendor that was used to send the pre-recorded messages. The Plaintiff issued a subpoena to the vendor who made the pre-recorded calls and the Defendant worked to collect records of those calls as well. Following several meet and confers, and a

motion where the Defendant attempted to bifurcate discovery (which was denied) the Defendant produced records of their pre-recorded messages but removed the complete telephone number. The Plaintiff has hired an expert to evaluate the calling data to determine if numbers were cellular or not and had filed a Motion to Compel [Doc. 43] that asserts that they need the full telephone number to do so.

5. Today, July 11, 2025, the Court entered an Electronic Order [Doc. 46 (no document attached)] ordering Defendant Folsom Insurance Agency to produce unredacted copies of the “broadcast reports” by July 18, 2025.
6. Following this ruling, additional time is needed to allow the parties to complete discovery after production of unredacted copies of the “broadcast reports” ordered by the Court, and allow the Defendant to appear for its 30(B)(6) deposition (scheduled to be completed in August).
7. The Parties agree to such an extension and the extension of these deadlines will not interfere with any other deadlines set forth in the Scheduling Order, especially since there is no trial setting presently assigned to the case.
8. Good cause exists to extend the case schedule because extension of these deadlines will allow the Parties necessary time to posture the case for depositions, complete Defendant’s 30(B)(6) deposition, prepare and file any dispositive motions and class certification motions after discovery is complete, and mediation before posturing the case for trial. This motion is filed to promote justice and not cause any undue delay.
9. Accordingly, the Parties jointly request the Court enter an order extending case schedule to allow the Parties additional time after document production is made to

have the expert witnesses process it, complete Defendant's 30(B)(6) deposition, complete discovery, and prepare and file any dispositive motions and class certification motions. In this regard, the Parties respectfully request a ninety (90) day extension of the case schedule, other than the date for mediation, such that the deadlines would be modified as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Completion of Discovery	July 18, 2025	October 16, 2025
Dispositive Motions and Motion for Class Certification	August 1, 2025	October 30, 2025
Plaintiff's Expert Designation	August 1, 2025	October 30, 2025
Defendant's Expert Designation	September 12, 2025	December 11, 2025
Motion challenging, seeking to disqualify, or otherwise related to a designated expert witness or his or her designation or testimony	August 20, 2025	November 19, 2025
Mediation	November 14, 2025	November 14, 2025

RESPECTFULLY SUBMITTED AND DATED this July 11, 2025.

/s/ Andrew Roman Perrong

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**ATTORNEYS FOR PLAINTIFF AND THE
PROPOSED CLASS**

Respectfully submitted,

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